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15 **UNITED STATES DISTRICT COURT**
16
17 **DISTRICT OF NEVADA**

18 RICHARD ZEITLIN, an individual;
19 ADVANCED TELEPHONY
20 CONSULTANTS; MRZ MANAGEMENT,
21 LLC; DONOR RELATIONS, LLC; TPFE,
22 INC.; AMERICAN TECHNOLOGY
SERVICES; COMPLIANCE
CONSULTANTS; CHROME BUILDERS
CONSTRUCTION, INC.; UNIFIED DATA
SERVICES;

23 Plaintiffs,

24 v.

25 BANK OF AMERICA, N.A.;

26 Defendant.

27 Case No.: 2:18-cv-01919-RFB-CWH

28 **STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
COMPLAINT TO NOVEMBER 16, 2018
(FIRST REQUEST)**

Pursuant to Local Rule 7-1, Plaintiffs Richard Zeitlin; Advanced Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified Data Services (the “Plaintiffs”) and Defendant Bank of America, N.A. (“BANA”), by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order for the extension of BANA’s deadline to respond to Plaintiffs’ Complaint in this action (the “Complaint”) to

1 November 16, 2018.

2 Plaintiff filed the Complaint in this Court on October 5, 2018;

3 BANA's deadline to respond to the Complaint is currently October 30, 2018; and

4 This is the Parties' first request for an extension of time to respond to the Complaint and is
5 not intended to cause any delay or prejudice to any party. The reason for the extension is to give
6 BANA time to evaluate and respond to the allegations set forth in the Complaint.

7 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time
8 for BANA to respond to the Complaint in this action is extended to and through November 16,
9 2018.

10 Dated: October 22, 2018

Dated: October 22, 2018

11 COOPER LEVENSON, P.A.

SNELL & WILMER L.L.P.

13 By: /s/ Joel F. Hansen (with permission)

Joel F. Hansen, Esq. (NV Bar 1876)
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16 Attorneys for Plaintiffs

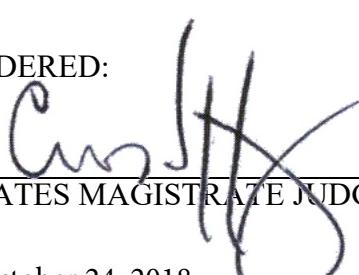
By: /s/ Kiah D. Beverly-Graham

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56 Attorneys for Bank of America, N.A.

22 **ORDER**

23 IT IS SO ORDERED:

25 
UNITED STATES MAGISTRATE JUDGE

27 DATED: October 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO RESPOND TO COMPLAINT TO NOVEMBER 16, 2018 (FIRST REQUEST)** with the Clerk of the Court for the U. S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: October 22, 2018

/s/ Lara J. Taylor
An Employee of Snell & Wilmer L.L.P.

Snell & Wilmer L.L.P.
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